

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE
DIVISION I

STATE OF TENNESSEE

VS.

PERRY AVRAM MARCH

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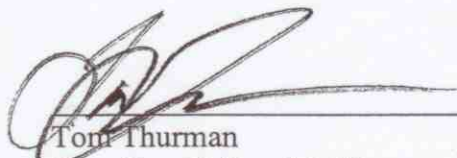
CASE NOS: 2004-D-3113
2005-D-2854

2005 MAY 23 11:11:13
DAVID C. THURMAN, CLERK
HEARD

MOTION IN LIMINE NO. 6

The Office of the District Attorney General, prosecuting on behalf of the State of Tennessee, moves this Court to disallow cross examination of Russell Nathaniel Farris about a misdemeanor assault conviction in Williamson County, Tennessee in 2005. This conviction is not relevant for impeachment pursuant to Rule 609 of the Tennessee Rules of Evidence. In addition, no factual basis exists to argue that he received favorable treatment for his testimony in this case. (See attached affidavit).

Respectfully submitted,



Tom Thurman
Tenn.Sup.Ct.Reg.#4738
Deputy District Attorney General
Washington Square, Suite 500
222 Second Avenue North
Nashville, TN 37201-1649
(615) 862-5500

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been mailed to
William D. Massey, Attorney at Law, 3074 East Street, Memphis, Tennessee 38128,
on this the 22 day of **May, 2006.**

A handwritten signature in dark ink, appearing to be "J. M. Massey", written over a horizontal line.

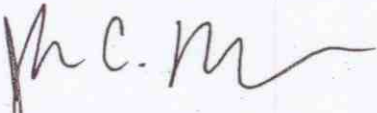
STATE OF TENNESSEE

COUNTY OF WILLIAMSON

AFFIDAVIT

I, Jennifer C. Moore, do hereby swear that the following is true and complete to the best of my recollections. The following is based on my independent recollections and a review of the case file. I am over eighteen (18) years of age and competent to testify.

1. I was the Assistant District Attorney for the 21st Judicial District who prosecuted *State of Tennessee v. Russell Nate Farris*, Case No. GSC 21219.
2. Appointed counsel, Josh Rogers, represented Russell Nate Farris.
3. Russell Nate Farris pled guilty to assault and accepted the agreed upon sentence of seven (7) days to serve in the Williamson County Jail.
4. Russell Nate Farris was prosecuted strictly on the merits of the case.
5. At no time before, during, or after the prosecution of Russell Nate Farris for assault did the Davidson County District Attorney General's office, contact me, in regards to disposition.
6. At no time before, during, or after the prosecution of Russell Nate Farris for assault did I contact the Davidson County District Attorney General's office in regards to disposition.
7. I began my position as an Assistant District Attorney for the 21st Judicial District on November 7, 2005.
8. Prior to November 7, 2005 I was living in Maryville, Tennessee and had no knowledge of Perry March or Russell Nate Farris.



Jennifer C. Moore
Assistant District Attorney
21st Judicial District
Williamson Co. Courthouse
PO Box 937
Franklin, TN 37065
615-790-5662 (ofc)
615-794-7299 (fax)

On this 15th day of May, before me personally appeared

Jennifer Moore to me known to be the person described in and who executed
the foregoing affidavit. Witness my hand and official seal.

My Commissions Expires: 2-17-08

Debra A. Stevens
Notary Public

